

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TEYO JOHNSON,

Plaintiff,

v.

EVERYREALM INC., WILLIAM KERR in his  
individual and professional capacities, JANINE  
YORIO, in her individual and professional capacities,  
and JULIA SCHWARTZ, in her individual and  
professional capacities.

Defendants.

Index No. 1:22-cv-06669(PAE)(GWG)

**PLAINTIFF'S NOTICE OF  
MOTION FOR LEAVE TO FILE A  
SECOND AMENDED  
COMPLAINT**

**NOTICE OF PLAINTIFF'S MOTION FOR LEAVE TO AMEND  
COMPLAINT UNDER F.R.C.P. RULE 15**

Upon the exhibits attached hereto and the accompanying memorandum of law, Plaintiff Teyo Johnson ("Plaintiff"), through his undersigned counsel, moves before this Court for an order granting Plaintiff leave to amend the operative First Amended Complaint by filing a Second Amended Complaint in substantially the form attached to the Declaration of Shane Seppinni in support of this Motion as Exhibit C.

**Dated:** January 18, 2023  
New York, New York

Respectfully submitted,

/s/ Shane Seppinni

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*Counsel for Plaintiff*